

FILED IN OPEN COURT
U.S.D.C. Atlanta

MAY 30 2018

James N. Hatten, Clerk
By: *Angela A. Smith*
Deputy Clerk

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

AMIE M. BROWN

Criminal Information

No. 18-CR-157

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One
Wire Fraud
(18 U.S.C. § 1343)

1. On or about August 24, 2015 through on or about August 22, 2017, in the Northern District of Georgia and elsewhere, the defendant, AMIE BROWN, with intent to defraud, did knowingly devise and intend to devise a scheme and artifice to defraud, by means of materially false and fraudulent pretenses and representations and by omissions of material facts, well knowing and having reason to know that said pretenses and representations were and would be false and fraudulent when made and caused to be made and that said omissions would be material.

Manner and Means

2. During the timeframe of the scheme, the defendant AMIE M. BROWN, served as a Financial Specialist to Organization A. As part of her job duties, she had control and access to Organization A's business banking account.

3. From on or about August 24, 2015 through on or about August 22, 2017, BROWN initiated 155 wire transfers from Organization A's Bank of America account to BROWN's Wells Fargo account ending in 7166. Notably, Organization A did not authorize any of these wire transfers. Moreover, BROWN took a number of steps to conceal from Organization A the nature and purpose of the wire transfers.

4. On a number of occasions, BROWN initiated the wire transfers from Organization A's bank account to a bank account associated with "Brian Armstrong" and "IT Solutions." But a review of the wire details shows that BROWN directed the payments for "Brian Armstrong" and "IT Solutions" to be deposited into the same Wells Fargo account ending in 7166 that she controlled.

5. To further conceal the scheme, BROWN doctored and manipulated accounting data in Organization A's QuickBooks file. BROWN not only concealed the transactions funneled into her account, she entered false information about Organization A's expenses, revenue, and other information that Organization A relied upon to conduct its affairs.

6. From on or about August 24, 2015 through on or about August 22, 2017, BROWN stole at least \$459,207.28 from Organization A by wiring funds into her Wells Fargo account ending in 7166.

Execution of the Scheme and Artifice

7. On September 24, 2015, in the Northern District of Georgia and elsewhere, the defendant, AMIE BROWN, for the purpose of executing the scheme and artifice to defraud and to obtain money and property by means of false and

fraudulent pretenses and representations, did, with intent to defraud, cause to be transmitted in interstate commerce, by means of a wire communication, certain writings, signs, signals, and sounds, namely, a \$3,500 wire transfer from a Bank of America account ending in 5699 to a Wells Fargo account ending in 7166.

All in violation of Title 18, United States Code, Section 1343.

Forfeiture Provision

8. As a result of committing the offense alleged in Count One, the defendant, AMIE M. BROWN, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2), and Title 28, United States Code, Section 2461, all property, real and personal, constituting or derived from proceeds traceable to the offense.

13. If, as a result of any act or omission of a defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

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